

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JENNIE QUAN, individually and as
successor in interest to BENJAMIN
CHIN, deceased,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
MARISOL BARAJAS; HECTOR
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS-KS

Assigned to:

Hon Mark C. Scarsi
Hon. Mag. Judge Karen L. Stevenson

**PLAINTIFF'S PROPOSED VOIR
DIRE**

Final Pretrial Conference:

Date: January 26, 2026

Time: 2:00 p.m.

Crtrm: 7C

Trial:

Date: February 10, 2026

1 **TO THE HONORABLE COURT:**

2 Pursuant to the Court's Order re: Jury/Court Trial, Plaintiff Jennie Quan
3 hereby submit Plaintiff's Proposed Voir Dire

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5 Respectfully submitted,

6
7 DATED: January 12, 2026

LAW OFFICES OF DALE K. GALIPO

8
9 By /s/ Hang D. Le

10 Dale K. Galipo

11 Hang D. Le

12 Attorneys for Plaintiff
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PLAINTIFF'S PROPOSED VOIR DIRE

Questions re Criminal History*

1. Do you know anyone who has ever been arrested or convicted of a crime?
2. Do you have any feelings, thoughts, or preconceptions about people who have been arrested or convicted of multiple crimes?
3. Do you think it would be difficult to be fair to both sides if you heard evidence that one of the parties had been arrested or convicted of crimes in the past?
4. If you heard evidence that one of the parties had been arrested or convicted of a crime in the past, do you think that you could still find that the officers' use of force was unreasonable?
5. If you learned that a person was arrested or convicted of a crime, would you believe that he deserves the same protection under the law as everyone else?
6. Do you know anyone who has ever taken out a restraining order against someone?
7. Do you know anyone who has had a restraining served upon them?
8. Do you have any feelings, thoughts, or preconceptions about people who have a restraining order issued against them?
9. Do you think it would be difficult to be fair to both sides if you heard evidence that one of the parties had a restraining order issued against them?
10. If you heard evidence that one of the parties had a restraining order issued against them, do you think that you could still find that the officers' use of force was unreasonable?

Questions re Flight from Police, Weapons, and Bias

1. If you learned that a person walked away from police, would you presume that that person committed a crime?

* Plaintiff requests this Court voir dire the jury on criminal history only in the event the Court denies Plaintiff's motion *in limine* on the subject.

2. Do you believe that a police officer has the right to punish a person who walks away from the police?
3. If you learned that a person was in possession of a firearm, would you presume the person is a danger to others?
4. If you learned that a person walked away from police while in possession of a firearm, would you presume the person is a danger to others?
5. Do you believe that a police officer has the right to punish a person who walks away from the police with a firearm?

Questions re Bias Against Persons with Mental Illnesses

1. Do you know anyone who has been diagnosed with a mental illness? If so, please explain:
 - a. That person's relationship to you; and
 - b. Whether they do or have ever lived with you.
2. Do you believe that people who are mentally ill are more prone to be violent?
3. Do you believe that people who are mentally ill deserve the same protection under the law as others?
4. Do you believe that mental illness is a medical condition?
5. Do you believe that mental illness is a type of disease or a behavior that a person should be able to control?

Questions re Peace Officer Bias

1. Do you think police officers get portrayed unfairly by the media?
2. Everything else being equal, would you be more likely to believe a police officer's testimony than the testimony of a non-police officer?
3. Do you think a police officer who is a defendant in a civil case is capable of testifying falsely under oath?

1 4. Do you think that a police officer is capable of testifying falsely under oath to
2 support a fellow officer?

3 5. Have you ever been a victim of a crime?

4 A. For what crime?

5 B. Did you have a positive or negative impression of law
6 enforcement as a result?

7 C. Could you set that experience aside and be fair to both sides?

8 6. Have any of your close family members or friends been a victim of a crime?

9 a. For what crime?

10 i. Did you have a positive or negative impression of law
11 enforcement as a result?

12 C. Could you set that experience aside and be fair to both sides?

13 7. Are you or any of your family members or close friends current or former
14 government employees or police officers?

15 A. If yes, what agency and what type of job?

16 12. Are you or any of your family members or close friends current or former
17 service members in any division or branch of our military?

18 A. If yes, what agency and what type of job?

19 13. Are you or is anyone you know a current or former peace officer?

20 A. Who, what agency, and how long?

21 14. Have you or has anyone you know attended or applied to attend any law
22 enforcement academy or basic training?

23 15. Have you or has anyone you know worked as or applied to work as a
24 firefighter, paramedic, or other type of emergency response personnel?

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26 **Questions re: Juror Connection to Defendants**
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1 1. Have you, a family member, or any of your close friends had any contact or
2 association with the County of Los Angeles, the Los Angeles County Sheriff's
3 Department, or any of its employees? If so:

4 A. Describe the circumstances of the contact or association.

5 B. Are there any ill feelings that you, your family, or any of your
6 close friends hold toward the Los Angeles County Sheriff's
7 Department or any of its employees? If so, please explain.

8 C. Would you view the evidence differently because of your past
9 experience with the Los Angeles County Sheriff's Department or
10 any of its employees?

11 17. Are you or is anyone you know a current or former employee for the County of
12 Los Angeles or any of its agencies?

13 A. Who do you know?

14 B. What is or was their job?

15 C. How long were they employed?
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17 **Questions re Justiciability of Peace Officer Conduct**

18 1. Do you think that our society should hold police officers liable in court when
19 they violate people's rights?

20 2. Do you think that police officers should be able to use as much force as they
21 want when detaining or arresting someone?

22 3. Do you think that our society should restrict the amount of force that police
23 officers can use when they are detaining or arresting people?

24 4. You will hear a lot of evidence and testimony in this case. However, if the
25 Court were to instruct you that your decision should be based only on what the
26 police officer knew at the time of his use of force, would you be able to set
27 aside evidence and information that the officer unknown to the officer when he
28 used force?